

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
HOT SPRINGS DIVISION**

HAWK TECHNOLOGY SYSTEMS, LLC

PLAINTIFF

VS.

CASE NO.: 6:15-CV-06037-RTD

OAKLAWN JOCKEY CLUB, INC.

DEFENDANT

JOINT MOTION TO STAY ALL DEADLINES

Plaintiff Hawk Technology Systems, LLC (“Hawk”) and Defendant Oaklawn Jockey Club, Inc. (“Oaklawn”) file this Joint Motion to Stay All Deadlines, and would show:

1. Hawk sued Oaklawn for infringement of U.S. Patent Numbers RE37,342 (the “’342 Patent”) and RE43,462 (the “’462 Patent”) (together the “Patents-in-Suit”) based on its use of certain “video storage and display systems and methods” and “video production and recording systems, methods, and apparatuses” (the “Accused Instrumentalities”). *See* 2d Am. Compl. [Dkt. 70] ¶¶ 30, 36.
2. Oaklawn moved to dismiss Hawk’s Second Amended Complaint under Fed. R. Civ. P. 12(b)(6). *See generally* Def’s Mot. Dismiss 2d Am. Compl. [Dkt. 72].
3. Hawk has since begun negotiations with the manufacturer of the Accused Instrumentalities.
4. In order to preserve the Court’s and parties’ resources while Hawk attempts to resolve all present and potential litigations related to the manufacturer’s products vis-à-vis the Patents-in-Suit, Hawk and Oaklawn have stipulated to a stay of this Action for 60 days.

Wherefore, Hawk and Oaklawn pray that the Court enter an order staying this litigation including all hearings and deadlines for 60 days to provide time for Hawk to negotiate with the manufacturer of the Accused Instrumentalities.

DATED: August 31, 2016

Respectfully submitted,

By: /s/ David A. Bailey
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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of August 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF System which will send notification of such filing to the following:

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By: /s/ David A. Bailey
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